# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA

IN RE: WRIGHT MEDICAL TECHNOLOGY, INC., CONSERVE HIP IMPLANT PRODUCTS LIABILITY LITIGATION

MDL No. 2329 1:12-md-2329-WSD

This Document Relates To: ALL CASES

#### JOINT STIPULATION REGARDING PRODUCTS

Per the Court's request at the initial status conference of April 23, 2012, the Parties, through their undersigned counsel, stipulate that claims against the following products, where the issues complained of relate to the Metal-on-Metal design (i.e., not a neck failure) should be included in MDL 2329:

- 1. The CONSERVE® Total Hip Implant System;
- 2. The CONSERVE® Total A-Class Advanced Metal Hip Implant System; and
  - 3. The CONSERVE® Resurfacing System.<sup>2</sup>

For the purposes of this MDL, CONSERVE® Total systems include a metal femoral head and a CONSERVE shell.

<sup>&</sup>lt;sup>2</sup> Claims involving any Wright Medical PROFEMUR System are not included in this MDL unless the PROFEMUR System was connected to a CONSERVE Total Hip Implant System or a CONSERVE Total A-Class Advanced Metal Hip

## This 22<sup>nd</sup> of May, 2012.

#### Respectfully submitted,

#### s/ Michael L. McGlamry

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Implant System and the alleged issues complained of relate to Metal-on-Metal design (i.e., not a neck failure).

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Counsel to Defendants Wright Medical Technology, Inc. and Wright Medical Group, Inc. **CERTIFICATE OF SERVICE** 

I hereby certify that the foregoing JOINT STIPULATION REGARDING

PRODUCTS has been electronically filed with the Clerk of Court using the

CM/ECF system which will automatically send email notification of such filing to

all counsel of record in MDL 2329.

This 22<sup>nd</sup> day of May, 2012.

s/ Michael L. McGlamry

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